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April 28, 2025

VIA ECF

Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Naquan Cintron v. City of New York, et al., 24-cv-06602 (PAE)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendant City of New York in this matter. Defendant writes to request a two week extension of time to file its answer to the complaint from April 28, 2025 to May 12, 2025. This is the first such request, to which plaintiff consents.

By way of background, plaintiff alleges, *inter alia*, claims of excessive force and false arrest pursuant to Section 1983, arising from his arrest on June 2, 2023 while speeding on a moped and running multiple red lights. See ECF No 1. Pursuant to Local Rule 83.10, which governs the initial deadlines in this case, plaintiff provided a 160.50 release on February 25, 2025. This request is made in light of issues with resolving representation for the individually named defendants. My office anticipates resolving the question of representation for all of the individually named defendants within the next two weeks.

Per the civil docket sheet, the individually named defendants, Officers Hua, Gutierrez, and Travis have been served process in this case. My office declined to represent Officer Hua and is in the process of informing him. I have also learned that Officer Travis has retired from the NYPD, after he was served, and my office is in the process of contacting him to discuss representation. Further, due to scheduling difficulties I have been unable to meet with Officer Gutierrez to discuss representation, but anticipate being able to do so within the next two weeks. As such, my office has not yet resolved representation for Officers Gutierrez and Travis. This extension of time would permit my office to resolve representation for Officer Gutierrez and Travis and for Officer Hua to contact union counsel and obtain representation. Therefore, in the interest of judicial economy, we hope that the Court may, *sua sponte*, extend their time to respond as well.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch
Senior Counsel

cc: **VIA ECF**
All Counsel of Record